

FIELD CHANGE REQUEST (FCR) FORM

Project Name: Arkema Project Area – PDI Phase 1

Project No.: CF167

Client: LSS/Retia USA

Request No.: FCR-04

To: Madi Novak, EPA Date: July 21, 2021

Field Change Request Title: Abandonment of Riverbank Boreholes Performed using Post-Hole Digger

Description:

Site conditions have necessitated the use of a post-hole digger to perform river bank borings instead of the 3-inch diameter hand auger. The use of a post-hole digger to advance portions of the riverbank borings generates more soil cuttings than was anticipated in the Pre-Design Investigation work plan using a 3-inch diameter hand auger. The post-hole borings are at least 6-inches in diameter and are often larger due to rocks and debris in the soil. Section 4.5.1 of the Field Sampling Plan (FSP; Appendix A to the Pre-design Investigation Work Plan) specifies that excess soils generated during hand auger and sampling activities will be transferred to properly labeled 55-gallon drums and the borings will be abandoned using bentonite chips to fill the boring.

The larger holes generated by the post-hole digger result in larger volumes of soil cuttings and bentonite that need to be carried to or from the riverbank boring locations, which creates a health and safety hazard due to the uneven terrain on the riverbank.

Recommended Change:

The riverbank soil borings will be backfilled with bentonite chips from total depth to 2 ft below ground surface. Soil cuttings will be placed in the borings from 2 ft below ground surface to the ground surface. If a boring is less than 2 ft below ground surface due to refusal, it will be backfilled with soil cuttings.

The excess soil cuttings will be placed in a properly labeled 55-gallon drum, as specified in the FSP. The portion of the borings backfilled with soil cuttings (i.e., 0-2 ft below ground surface) is shallow and will not create a conduit for contamination.

Eron Dodak

Field Operations Lead (or designee)



Signature

July 21, 2021

Date

Approval:

Eron Dodak

Project Manager



Signature

July 21, 2021

Date

Madi Novak
EPA Remedial Project Manager

Signature

Date

Distribution:

LSS Project Coordinator
Integral Project Manager
Field Operations Lead
QA Officer

Project File

Other: